

REMARKS

Claims 1-21 are pending in this application. Claims 1, 15 and 21 are independent claims. Claims 1, 4, 5, 15 and 21 have been amended by this Amendment. This Amendment is responsive to the Office Action mailed on April 24, 2007, which has been carefully considered.

Initially, claim 1 has been objected to because of an informality and claims 4 and 5 have been rejected under 35 U.S.C. 112, second paragraph, as being indefinite. These claims have been amended to address the objection and rejection and it is respectfully submitted that they have been overcome. All of the claims now of record are believed to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Accordingly, reconsideration and withdrawal of the aforementioned objection and rejection is respectfully requested.

Regarding the previous prior art rejection of claims 1-21, it is noted that the Office Action has indicated that such arguments are persuasive. As explained in paragraph 4 of the Office Action, the new prior art rejection is based on a newly cited U.S. Patent 6,973,057 to Forslow in view of or when combined with one or more secondary references. Thus, claims 1-5, 9-12, 15-17 and 19-21 have been rejected as being obvious and, therefore, unpatentable in view of Forslow in view of Malkin '650 for reasons set forth on pages 3-7 of the Office Action, while claim 8 has similarly been rejected on the basis of Fuccello and Malkin in further view or when further combined with Published U.S. Patent Application No. 2003/0032414 to Melaku, for reasons set forth on page 8. Claims 13 and 14 have similarly been rejected but on a combination of

Forslow and Malkin in further view or when further combined with U.S. Published Patent Application No. 2001/0009025 to Ahonen.

In order to more clearly define the invention and distinguish same over the applied prior art, independent claims 1, 15 and 21 have been amended. More specifically, the independent claims have been amended to move some recitations from the preamble of the claims to the body of the claims, to clarify the function of the proxy; to change the receiving of the authentication request in claims 1 and 21 to the detection of the generation of the authentication request; to clarify the interrelation between the identifier and proxy, and to recite functions of the identifier. Exemplary, non-limiting, support for the newly recited features can be found at, for example, page 6, lines 3-17, and page 12, lines 1-8, of the original filed specification.

In view of the amendments to the claims and the remarks that follow the prior art rejections under 35 U.S.C. 103 are respectfully traversed. The Examiner is respectfully requested to reconsider and withdraw these rejections.

It appears that the current prior art rejections are largely the same as the previous prior art rejection except that the primary reference is changed from Fuccello to Forslow to rely on the network architecture discussed therein. Once again, the specifics on authentication details and the motivation for modifying Forslow are asserted to be suggested by Malkin.

First, Forslow may include a plurality of authenticators (AAA), each of which is associated with one of a plurality of access network portions. But it appears from Fig. 8 that the authenticators are coupled to the public mobile IP access networks rather than a core network portion as recited in the claims. That is, it appears that Forslow teaches

access network portions, each comprising an UTRAN and a public mobile IP access network, and a core network portion comprising an Internet backbone. In Fig. 1, the BS (UTRAN), foreign agents (CGSN FA), authenticators (AAA) and home agents (HA) are denoted as parts of the access networks. Further, in the specification, it is stated that the public mobile IP access network “provides data access to the Internet and data access to the mobile node” (see col. 5, lines 16 to 19; col. 7, lines 34 to 37; and col. 19, lines 41 to 45).

Accordingly, the public mobile IP access network in Forslow serves as an access network portion, rather than as a core network portion. Thus, the authenticators are apparently coupled to the access network portions, and not to the core network portion, as recited in the amended independent claims.

Even if the public mobile IP access network in Forslow was considered to be a core network portion (which is traversed by the applicant), the architecture is not equivalent either. If the public mobile IP access network was considered to be a core network portion, the foreign agents (CGSN FAs), which are apparently considered to read on the recited proxy, would then be arranged at the core network as well, as they are obviously associated with the IP access network portion. Thus, the alleged proxy in Forslow is located in the core network portion, and not in the access network portion, as recited in the amended independent claims.

Second, a gateway element of the foreign agent (CGSN FA) in Forslow does not read on the claimed proxy element. The foreign agent is merely for relaying requests and replies (see, for example, abstract and col. 3, lines 9-18) and for tunneling purposes in

this regard (see, for example, col. 19, lines 35-40). Accordingly, the foreign agent is only a gateway, and is not a proxy.

Furthermore, as acknowledged in the rejection, Forslow does not provide details on authentication, but is concerned instead with mobility management and routing in IP-based data communications (see, for example, col. 1, lines 10 to 13, and col. 19, lines 41-47). When considered as a whole, Forslow suggests using MPLS instead of Mobile-IP as a routing and tunneling protocol (see, for example, col. 3, line 43, to col. 4, line 18, and col. 8, lines 8-17).

There is also no suggestion for a modification or combination with Malkin as proposed in the rejection. This is because Malkin does not describe plural access networks and/or plural authenticators. Furthermore, it is believed that a combination of these patents is probably neither obvious nor feasible.

This is mainly due to the different underlying network architectures. Malkin has one authentication server coupled to one access network and Forslow has plural authentication servers coupled to one access network portion each. And even if combined, it is believed that the thus claimed network architecture according to the present invention (i.e. plural authenticators associated with one access network each, but coupled with the core network) could not be rendered obvious thereby. Additionally, there is not recognizable, in any one of these documents, any indication or suggestion in favour of their combination.

Conclusion

In view of the foregoing, it is respectfully submitted that claims 1, 15 and 21 clearly and patentably distinguish over the art and should be allowed. The remaining claims depend directly or indirectly on allowable claims 1, 15 and 21 and should, therefore, be allowed with the allowance thereof.

Early allowance and issuance of this application is, therefore, respectfully requested.

Dated: July 24, 2007

Lackebach Siegel LLP
One Chase Road
Scarsdale, New York 10583
(914) 723-4300

Respectfully submitted,



Robert M. Bauer, Reg. No. 34,487